

**EXHIBIT A**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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*Counsel for Ad Hoc Group of Customers of Powin, LLC*

In re:

Powin, LLC, *et al.*,<sup>1</sup>

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

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Debtors: Powin, LLC, *et al.*

Case No. 25-16137(MBK)

Caption of Order: Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group's Declarations and Witness and Exhibit List

**ORDER AUTHORIZING  
AD HOC CUSTOMER GROUP  
TO REDACT AND FILE UNDER SEAL  
CONFIDENTIAL INFORMATION CONTAINED  
IN EXHIBITS IN CONNECTION WITH AD HOC  
CUSTOMER GROUP'S DECLARATIONS AND WITNESS AND EXHIBIT LIST**

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The relief set forth on the following pages, numbered two (2) through three (3), is **ORDERED**.

Upon the Motion (the “*Motion to Seal*”)<sup>2</sup> of Lone Star Solar, LLC, Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC (each a “*Customer*,” and collectively, the “*Ad Hoc Customer Group*”), each a creditor, customer, and party in interest, by and through their undersigned counsel for entry of an order (this “*Order*”): (a) authorizing the Ad Hoc Customer Group to redact and file under seal certain (i) confidential information contained in exhibits within the Ad Hoc Customer Group's witness and exhibit list for the hearing to be held on July 15, 2025 at 11:30 a.m. (ET) (the “*Witness and Exhibit List*”) and (ii) confidential contracts contained in exhibits within the Ad Hoc Customer Group's declarations in support of the *Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 297] (the “*Declarations*”); (b) directing the exhibits and contracts containing confidential information to remain under seal and confidential and not be required to be made available to anyone, except to (i) the Court, (ii) the U.S. Trustee,

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion to Seal.

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Debtors: Powin, LLC, *et al.*

Case No. 25-16137(MBK)

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(iii) counsel to the Debtors, and (iv) any other party as may be ordered by the Court or agreed to by the Ad Hoc Customer Group; and (c) granting related relief as more fully set forth in the Motion to Seal; and the Court having jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and this Court having found that venue of this proceeding and the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Ad Hoc Customer Group's notice of the Motion to Seal was appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion to Seal and having heard the statements in support of the relief requested therein at a hearing before this Court, and objections, if any; and this Court having determined that the legal and factual bases set forth in the Motion to Seal and the Certifications establish just cause for the relief granted herein such that the proposed information the Motion to Seal seeks to restrict from the docket is properly protected under section 107(b) as confidential commercial information; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby:

☐ ORDERED that the request is granted and the unredacted documents shall be filed under seal.

☐ ORDERED that the request is denied and the underlying unredacted document(s) shall be deleted from the court's electronic filing system.